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8 *Counsel for Federal Defendants*

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT CALIFORNIA**
WESTERN DIVISION

12)
13 CENTER FOR BIOLOGICAL)
14 DIVERSITY, et al.,)
15 Plaintiffs,) Case No. 2:24-cv-05459-MWC-
16 v.) MAA

17 WALTER CRUICKSHANK, in his official)
18 capacity as Acting Secretary of the Interior,¹) **DECLARATION OF**
19 et al.,) **DANIEL C. LUECKE IN**
20 *Federal Defendants*) **SUPPORT OF REQUEST**
21 and) **FOR LEAVE TO APPEAR**
22 SABLE OFFSHORE CORP.,) **AT HEARING REMOTELY**

23 Intervenor-Defendant.)
24) Honorable Michelle Williams
25) Court
26) United States District Judge
27)

26 ¹ Under Federal Rule of Civil Procedure 25(d), Mr. Cruickshanks is automatically
27 substituted for Debra Haaland, formerly Secretary of the Interior.

1 I, Daniel C. Luecke, declare as follows:

2 1. I am counsel for Defendants Walter Cruickshank, in his official capacity
3 as Acting Secretary of the U.S. Department of the Interior; Bruce Hesson, in his
4 official capacity as Pacific Regional Director for the Bureau of Safety and
5 Environmental Enforcement (“BSEE”); and BSEE (“Federal Defendants”). In
6 support of Federal Defendants’ Request for Leave to Appear at Hearing Remotely,
7 and consistent with the Court’s standing order, ECF No. 34, I state as follows:

8 2. The hearing on Plaintiffs’ pending Motion for Leave to File First
9 Supplemental and Amended Complaint is currently noticed for February 7, 2025,
10 at 1:30 p.m.

11 3. Federal Defendants have taken no position on Plaintiffs’ pending motion
12 and do not intend to offer any argument at the hearing on Plaintiffs’ motion.

13 4. I am presently the only trial attorney at the United States Department of
14 Justice assigned to this matter.

15 5. I reside and work in Washington, D.C.

16 6. On January 27, 2025, I emailed counsel for Plaintiffs and Intervenor-
17 Defendant to request the parties’ positions on Federal Defendants’ request to
18 appear remotely. They informed me that none of the parties object to this request.

19 7. On January 28, 2025, I emailed the Court’s Chambers to request
20 guidance on requesting permission to appear remotely at the hearing on Plaintiffs’
21 motion. I was instructed to file a request and a proposed order.

22 8. I declare under penalty of perjury that the foregoing is true and correct.

23
24 Executed this 30th day of January, 2025.



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26 Daniel C. Luecke
27 Counsel for Federal Defendants